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April 28, 2023

**VIA ECF**

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: *Martinez v. La Maria Pizzeria Corp. et al.***  
**Civil Action No. 22-cv-04578-KPF**

Your Honor:

We are attorneys for plaintiff in the above-captioned matter, and submit this letter jointly with counsel for defendants 1455 Nepperhan Rest Corp., Laurie Tranquillo, and Albert Tranquillo (together with plaintiff, the "Parties") to respectfully request a short extension of the Parties' deadline to submit the proposed settlement agreement and letter motion for approval. This is the Parties' second request for an extension.

Pursuant to Your Honor's order dated April 14, 2023, the Parties were required to submit their settlement agreement and letter motion for approval to the Court on or before April 28, 2023. Since that time, counsel have finalized the essential terms of the settlement agreement and request a brief extension until May 11, 2023, in order to conduct a final review and formalize the execution of the agreement.

The parties apologize to the Court for the untimeliness of this request. The parties are confident that they will be able to submit the agreement and accompanying Cheeks letter motion to the Court by May 11, 2023.

We thank the Court for its attention to this matter.

Respectfully submitted,  
/s/ Eliseo Cabrera  
Eliseo Cabrera

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket number 40.

Dated: May 1, 2023  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE